

All Cases: Debtor(s) John Frazier Case No. 15-23827 Chapter 7

All Cases: Moving Creditor WELLS FARGO BANK, N.A.

Date Case Filed 7/13/15

Nature of Relief Sought: X Lift Stay        Annul Stay        Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed \_\_\_\_\_

Chapter 7:        No-Asset Report filed on \_\_\_\_\_  
X No-Asset Report not Filed, Date of Creditor's Meeting: 12/2/2015

1. Collateral

a. Home X  
b. Car        Year, Make and Model \_\_\_\_\_  
c. Other \_\_\_\_\_

2. Balance Owed as of 12/29/2015: \$378,723.11

Total of all other Liens against Collateral: \_\_\_\_\_

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$250,000.00, per Debtor's Schedules.

5. Default

a. X Total Default as of 12/29/2015  
Number of months 25 Amount \$65,944.64

b.        Post-Petition Default

i.        On direct payments to the moving creditor  
Number of months \_\_\_\_\_ Amount \_\_\_\_\_

ii.        On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \_\_\_\_\_

6. Other Allegations

a.        Lack of Adequate Protection § 362(d)(1)

i.        No insurance  
ii.        Taxes unpaid Amount \_\_\_\_\_  
iii.        Rapidly depreciating asset  
iv.        Other (describe) \_\_\_\_\_

b. X No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c.        Other "Cause" § 362(d)(1)

i.        Bad faith (describe) \_\_\_\_\_  
ii.        Multiple filings  
iii.        Other (describe) \_\_\_\_\_

d. Debtor's Statement of Intention regarding the Collateral

i. X Reaffirm ii.        Redeem  
iii.        Surrender iv.        No Statement of Intention Filed

Date: 1/5/2016

/s/ Joel P. Fonferko  
Counsel for Movant